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VS.

- 1	NA CONTRACTOR OF THE PROPERTY
1	TIMOTHY E. ROWE (#1000) MEGAN STARICH (#11284)
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3	P.O. Box 2670
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6	mstarich@mcdonaldcarano.com Attorneys for Defendants
7	TRUCKEE MEADOWS WATER AUTHORITY and YUGANDHAR NARALA
8	JEFFREY A. DICKERSON (#2690)
9	9585 Prototype Ct., Suite A Reno, NV 89521
10	Telephone: (775) 786-6664 Facsimile: (775) 786-7466
11	ieff@gbis.com Attorneys for Plaintiff
12	UNITED STATES D
13	DISTRICT OF
14	TRUDY J. SALLEY,

## DISTRICT COURT

## OF NEVADA

Plaintiff.

YUGANDHAR NARALA, an individual, TRUCKEE MEADOWS WATER AUTHORITY, a non-profit communityowned water utility,

Defendants.

Case No. 3:12-CV-00306-RCJ-WGC

STIPULATION AND ORDER FOR ENLARGEMENT OF TIME TO FILE RESPONSIVE PLEADING AFTER FILING OF AN AMENDED COMPLAINT (Second Request)

The parties stipulate and agree that Defendants Yugandhar Narala and Truckee Meadows Water Authority ("TMWA") (collectively "Defendants") should have an enlargement of time of 30 days in which to respond to the complaint. Counsel for Defendants accepted service of process on behalf of the Defendants on May 17, 2012. Defendants removed this action to this court on June 6, 2012. Therefore, a responsive pleading was originally due on June 13, 2012. On June 15, 2012, the parties stipulated that Defendants' new deadline to respond to Plaintiff's complaint was August 13, 2012, and the Court approved of this stipulation on June 15, 2012. The parties now stipulate

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and agree that Defendants' new deadline to respond to Plaintiff's Complaint should be September 12, 2012.

Good cause exists for the requested relief as there is a pending EEOC charge filed by Plaintiff against TMWA, and Plaintiff intends to obtain a right to sue notification. As of the date of this stipulation, the charge has apparently been forwarded to the USDOJ, and the right to sue notification has not yet been issued by the USDOJ.

The parties further stipulate and agree that once Plaintiff obtains a right to sue notification from the USDOJ, she may amend her Complaint to add her additional federal claims that are currently pending before the EEOC/USDOJ.

The requested enlargement of time for Defendants to file a responsive pleading is made to the interest of efficiency and to conserve judicial resources by allowing Plaintiff to assert all her claims in a single complaint to which Defendants can then respond. Defendants, by agreeing to allow Plaintiff to amend her complaint, do not in any way intend to waive any defenses or rights with respect to the claims pled in Plaintiff's original complaint.

The undersigned submit this is not for the purpose of delay, but rather in the interests of effectively managing the recently-removed case in its infancy.

DATED: August 9, 2012 LAW OFFICES OF JEFFREY A. DICKERSON

DATED: August 9, 2012 McDONALD CARANO WILSON LLP

By: /s/ Jeffrey A. Dickerson

Jeffrey A. Dickerson 9585 Prototype Ct., Suite A Reno, NV 89521 Attornevs for Plaintiff

By: /s/ Megan Starich

Timothy E. Rowe Megan Starich 100 West Liberty Street, 10th Floor Reno, NV 89505-2670 Attorneys for Defendants

ORDER

There shall be no further extensions.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: August 13, 2012.